

Exhibit 3

Washington N.F.L. Team Owner Files Claims Hinting at a Conspiracy

Daniel Snyder is seeking documents from a former employee to bolster his case asserting a campaign to damage him is being waged as shareholders seek to sell their stake in the team.



By Ken Belson and Katherine Rosman

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Daniel Snyder, the owner of the Washington Football Team, has accused a disgruntled former team employee of taking money and assisting in a campaign to spread damaging information against him, his latest effort to fight back attacks on his ownership of the N.F.L. club.

In a filing on Monday in Federal District Court in Alexandria, Va., Snyder asked for access to documents that the former employee, Mary-Ellen Blair, who was an executive assistant in the front office, has, including confidential team records, that might bolster his defamation case against an Indian media company that he contends published defamatory rumors about him.

“We are aggressively pursuing Mary-Ellen Blair, a disgruntled former employee who is clearly in the pocket of another and complicit in this scheme to defame Mr. Snyder, in order to ensure that the full weight of the law comes down heavily on all those responsible for these heinous acts,” one of Snyder’s lawyers, Joe Tacopina, said in a statement.

The filing, known as a request for discovery, was made three days after Snyder filed a defamation lawsuit in New Delhi against Media Entertainment Arts WorldWide, whose parent company is in India. Media Entertainment Arts WorldWide published articles on its website in July that Snyder considered slanderous and that have since been taken down. Snyder accused the company of accepting money to publish the articles. He wants to identify who paid for them.

Nirnay Chowdhary, a founder of M.E.A. WorldWide, admitted errors were made in the publication of the articles, but he denied that his company accepted money in exchange for their publication.

The case comes amid a growing battle between Snyder and three of his largest minority shareholders, who have been seeking to sell their stakes, which amount to roughly 40 percent of the team. The minority shareholders, including Frederick W. Smith, the chairman of FedEx, hired an investment banker to broker a sale. Snyder has shown no interest in selling his majority stake in the team, which he has owned since 1999.

While Snyder pursues the source of the articles, he has also hired an investigator to look into accusations, detailed in a Washington Post report, of widespread sexual harassment in the team’s front office, which he has not denied. In July, he agreed to drop the team’s name and logo after many years of protests by Native American groups and others who considered it racist. Snyder was pressured by several sponsors, most notably FedEx, which threatened to sever its multimillion-dollar stadium naming rights deal if the team name was not changed.

According to the filing on Monday, Blair, starting in late May or early June, started reaching out to current and former team employees seeking information that would discredit the team owner. In July, she called someone that the filing describes as a team employee who works daily with Snyder and said the person could “probably make a lot of money” by providing damaging information about Snyder, the filing said.

Reached briefly by phone on Monday, Blair said she was unaware of the filing. “That’s funny,” she said when told of some of the details included in it. She didn’t respond to further request for comment.

In an emailed statement, Lisa J. Banks, Blair’s lawyer, said that Snyder’s naming of her in the filing is “an obvious and inappropriate attempt to silence Ms. Blair and others who may wish to communicate with legitimate news organizations about the culture of sexism, harassment and abuse that has existed at the highest levels of the Washington Football Team.”

The filing also said Blair told a personal employee of Snyder’s and two other team employees that “she was in contact with and working in coordination with a third party” and that she and that third party were involved in preparing articles that were going to be damaging to Snyder. The third party, she told them, was not a journalist, but was “well known to each of the involved persons.”

According to the filing, Blair also told a team employee who has frequent contact with Snyder that she had been told by someone not employed by The Washington Post, but well known to this employee, that an article would be published in the newspaper in approximately a week that would not be “good for Dan.” This was weeks before rumors about the subject of the article began circulating on social media.

According to the filing, Blair also told a “longtime personal employee” of Snyder’s before the social media whispering about the publication of damaging stories that “something big was going to happen.” Blair also told this employee that “several of the team’s minority owners did not want to do business” with Snyder any longer.

In the filing, Snyder said Blair left the team on bad terms and “has since admitted to having absconded with confidential information” belonging to the team. The filing also describes what it says are Blair’s financial difficulties and says that while she worked for the team, her wages were garnished.

Snyder contended that she has an unidentified “financial benefactor” who has provided discounted rent in luxury apartment buildings in Virginia that are connected to a minority shareholder who is seeking to sell his stake.

Tracy Schar, the daughter of Dwight Schar, one of the team’s minority shareholders seeking to sell, is senior vice president for marketing and brand management at Comstock Holding Companies, the real estate development company that manages the building where Blair lives. Two other members of Comstock’s board worked for Red Zone Capital, which is co-owned by Dwight Schar and Snyder, according to a 2018 government filing.

Snyder, in the filing, requested the right to have access to documents from Blair and Comstock to gather more material to bolster his defamation suit in India against Media Entertainment Arts WorldWide.